

### REMARKS

Claims 1-17 are pending in the present application. By this response, claims 1-17 are amended. Claims 1, 16 and 17 are amended to recite "defining a new idea in a manner dependent on the client apparatus platform, wherein defining the new idea comprises: creating at least one element declaration tuple that defines a element type and at least one attribute, wherein the element type is one of a thought, an image, a group, a relationship and a hierarchy; creating at least one attribute declaration tuple that describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type; and creating at least one element tuple that describes the instance of the element declaration tuple." Support for these amendments may be found at least on page 40, line 10 to page 41, line 2 of the specification. Claim 1 is further amended and claims 2-15 are amended for proper claim format. Reconsideration of the claims in view of the above amendments and the following remarks is respectfully requested.

#### **I. 35 U.S.C. § 103, Alleged Obviousness, Claims 1-17**

The Office Action rejects claims 1-17 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bowman-Amuah (U.S. Patent No. 6,742,015 B1). This rejection is respectfully traversed.

As to claims 1, 16 and 17, the Office Action states:

Per claims 1, 16-17, an application adapted to run on a client apparatus connectable with a server across a Network (Fig. 1, and col. 15, lines 22-52, Web application which span from client to server and interoperate), said server adapted to simultaneously share information maintained therein with a plurality of heterogeneous clients (col. 56, lines 41 to col. 57, line 4, access to Network attached resource and the requirement for heterogeneous environment), wherein said information comprises a plurality of ideas (col. 45, lines 6-20, information to be displayed as an editable field.), said application comprising:  
means for retrieving said ideas from said server; means for defining a new idea in a manner dependent on the client apparatus platform (col. 108,

lines 14-28, Push/Pull Services allow for interest in a particular piece of information to be registered and then changes or new information to be communicated to the subscriber list, and the technology uses the Internet's strengths as a two-way conduit by allowing people to specify the type of content they want to receive); and means for transmitting said new idea to said server in a platform-independent manner (col. 74, lines 27-40, Lotus Notes—platform-independent client/server mail system. Notes Mail can support over 1,500 active users per server, offering Internet integration, distributed replication and synchronization).

Bowman-Amuah, does not teach of "transmitting new edited information [new idea] for maintenance". However, Bowman teaches of a Directory service that makes resources location and platform independent, since it allows users to locate resources via the directory and regardless of their physical location, for the reason to be able to locate resource regardless of their physical location and client's platform. Therefore, it would have been obvious for one ordinary skill in the art at the time the invention was made to maintain the information, same way as resource to allow users to locate information via a directory and regardless of their physical location and platform (col. 62, line 66 to col. 63, line 14).

Office Action dated June 17, 2004, pages 2-3.

Claim 17, which is representative of the other rejected independent claims 1 and 16 with regard to similarly recited subject matter, reads as follows:

17. A method in an application a data processing system adapted to run on a client apparatus connectable with a server across a network, said server adapted to simultaneously share information maintained therein with a plurality of heterogeneous clients, wherein said information comprises a plurality of ideas, said method comprising the steps of:
- retrieving said ideas from said server;
  - defining a new idea in a manner dependent on the client apparatus platform, wherein defining the new idea comprises:
    - creating at least one element declaration tuple that defines a element type and at least one attribute, wherein the element type is one of a thought, an image, a group, a relationship and a hierarchy;
    - creating at least one attribute declaration tuple that describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type; and
    - creating at least one element tuple that describes the instance of the element declaration tuple; and
  - transmitting said new idea to said server for maintenance in a platform-independent manner.

Applicants respectfully submit that Bowman-Amuah fails to teach or suggest defining a new idea in a manner dependent on the client apparatus platform, wherein defining the new idea comprises: creating at least one element declaration tuple that defines a element type and at least one attribute, wherein the element type is one of a thought, an image, a group, a relationship and a hierarchy; creating at least one attribute declaration tuple that describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type; and creating at least one element tuple that describes the instance of the element declaration tuple.

Bowman-Amuah is directed to a system for providing base service patterns for use in a component-based architecture. In the Bowman-Amuah system, a batch job pattern is provided for structuring batch components such that common architectural services are implemented uniformly across the batch components. A batch unit of work pattern is utilized for structuring work to be processed by the batch components so that the work is treated uniformly by the batch components. A processing pipeline pattern is implemented for structuring batch activities for simplified reconfiguration of the batch activities, including preparing to perform a series of processing steps on input objects, encapsulating each of the processing steps within a filter, receiving and processing the input objects in one of the filters; delivering results from the filters incrementally during processing of the input objects, utilizing connectors for connecting at least two of the plurality of filters, and using connectors for connecting input and output filters of different processes for forming a scalable system. An abstraction factory is used to encapsulate differences between objects such that only activities that need to understand the difference between the objects have to deal with the differences.

Thus, with the system of Bowman-Amuah batch components are structured and processed through a pipeline in order to increase the level of interaction between components in the systems. Bowman-Amuah does not teach or suggest defining a new idea in a manner dependent on the client apparatus platform, wherein defining the new idea comprises: creating at least one element declaration tuple that defines a element type and at least one attribute, wherein the element type is one of a thought, an image, a group, a relationship and a hierarchy; creating at least one attribute declaration tuple that

describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type; and creating at least one element tuple that describes the instance of the element declaration tuple. The Office Action alleges that these features are taught at column 108, lines 14-28, which reads as follows:

Push/Pull Services allow for interest in a particular piece of information to be registered and then changes or new information to be communicated to the subscriber list. Traditional Internet users "surf" the Web by actively moving from one Web page to another, manually searching for content they want and "pulling" it back to the desktop via a graphical browser. But in the push model, on which subscription servers are based on, content providers can broadcast their information directly to individual users' desktops. The technology uses the Internet's strengths as a two-way conduit by allowing people to specify the type of content they want to receive. Content providers then seek to package the requested information for automatic distribution to the user's PC.

In this section, Bowman-Amuah is merely teaching that when information changes on a Web page, those changes may be communicated to a subscriber list. As described by Bowman-Amuah, Web pages are resident on internet servers and are in a HTTP format so the information is platform-independent. Thus, Bowman-Amuah does not teach defining a new idea in a manner dependent on the client apparatus platform. Applicants respectfully submit that Bowman-Amuah does not teach this feature as Bowman-Amuah is directed to improving the level of interaction between components in the systems of a Web environment.

Additionally, Bowman-Amuah does not teach creating at least one element declaration tuple that defines an element type and at least one attribute, wherein the element type is one of a thought, an image, a group, a relationship and a hierarchy; creating at least one attribute declaration tuple that describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type; and creating at least one element tuple that describes the instance of the element declaration tuple. The Office Action admits that Bowman-Amuah fails to teach maintaining edited information as tuples of a tuplespace but somehow comes to the conclusion that it is well known in the art to make a directory in a file structure [or tuple form] for the ease of access.

However, Applicants are not merely claiming a directory of a file structure. The presently claimed invention creates an element declaration tuple that defines an element type and an attribute. Nowhere in any section of Bowman-Amuah, is it taught or suggested to create a directory structure that defines an element type and an attribute where the element type is a thought, an image, a group, a relationship or a hierarchy. Furthermore, Bowman-Amuah does not teach or suggest creating at least one attribute declaration tuple that describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type. Even assuming, arguendo, that a directory in a file structure is equivalent to a tuple form, there is nothing in any section of Bowman-Amuah that teaches or suggests creating at least one attribute declaration directory that describes the at least one attribute associated with the element declaration directory, wherein the at least one attribute defines an individual characteristic of the element type. Still further, Bowman-Amuah does not teach creating at least one element tuple that describes the instance of the element declaration tuple. As discussed above, Bowman-Amuah does not teach or suggest the creation of an element declaration tuple that defines an element type and at least one attribute and an attribute declaration tuple that describes the at least one attribute associated with the element declaration tuple, thus, Bowman-Amuah does not teach or suggest creating at least one element tuple that describes the instance of the element declaration tuple.

One of ordinary skill in the art, being presented only with Bowman-Amuah, and without having a prior knowledge of Applicants' claimed invention, would not have found it obvious to modify Bowman-Amuah to arrive at Applicants' claimed invention. Bowman-Amuah is directed to a system for providing base service patterns for use in a component-based architecture. The present invention is aimed to knowledge sharing between heterogeneous devices. Even assuming, arguendo, that one would be motivated to modify Bowman-Amuah, Bowman-Amuah does not have a need to defining a new idea in a manner dependent on the client apparatus platform, wherein defining the new idea comprises: creating at least one element declaration tuple that defines a element type and at least one attribute, wherein the element type is one of a thought, an image, a group, a relationship and a hierarchy; creating at least one attribute declaration tuple that

describes the at least one attribute associated with the element declaration tuple, wherein the at least one attribute defines an individual characteristic of the element type; and creating at least one element tuple that describes the instance of the element declaration tuple as Bowman-Amuah only improves the level of interaction between components in the systems of a Web environment.

Thus, in view of the above, Applicants respectfully submit that Bowman-Amuah does not teach or suggest all of the features of independent claims 1, 16 and 17 as is required under 35 U.S.C. § 103(a). At least by virtue of their dependency on independent claim 1, the specific features of dependent claims 2-15 are not taught or suggest by Bowman-Amuah. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-17 under 35 U.S.C. § 103(a).

Moreover, in addition to their dependency from independent claim 1, the specific features recited in claims 2-15 are not taught or suggest by Bowman-Amuah. For example, with regard to claim 2, Bowman-Amuah does not teach or suggest rendering said retrieved ideas in a manner dependent on the client apparatus platform and, responsive to user interaction, for manipulating said retrieved ideas. The Office Action alleges that this feature is taught at column 108, lines 14-28, shown above. As discussed above, this section of Bowman-Amuah merely teaches that when information changes on a Web page, those changes may be communicated to a subscriber list. There is nothing in this section, or any other section of Bowman-Amuah, that teaches or suggests rendering a retrieved idea in a manner dependent on the client apparatus platform and, responsive to user interaction, for manipulating the retrieved idea.

Thus, in addition to being dependent on independent claim 1, dependent claims 2-15 are also distinguishable over Bowman-Amuah by virtue of the specific features recited in these claims. Accordingly, Applicants respectfully request withdrawal of the rejection of dependent claims 2-15 under 35 U.S.C. § 103(a).

## II. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

DATE: September 17, 2004

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